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Attorneys for Defendant
Farr Financial, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HOWARD B. HIGGINS, an individual,)
Plaintiff,)
vs.)
FARR FINANCIAL, INC., a California)
Corporation, ZENITH INVESTMENT)
GROUP LLC, a California Limited)
Liability Company, AMAECHI)
GEORGE OZOR, an individual, and)
JOHN/JANE DOES I-X, individuals or)
entities whose identities are unknown,)
Defendants.)

No. C 07-02200 JSW

**STIPULATION BY PLAINTIFF
AND DEFENDANT FARR
FINANCIAL, INC. TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFF'S
SECOND AMENDED
COMPLAINT, AND PROPOSED
ORDER**

On December 10, 2008, Plaintiff Howard B. Higgins filed a Second Amended Complaint And Demand For Jury Trial ("Second Amended Complaint"). Defendant Farr Financial, Inc. ("Farr") and Plaintiff Howard B. Higgins, by and through their respective counsels, submit this stipulation, in which they agree that the time for defendants in this matter to respond to the Second Amended Complaint is extended by ten days through January 9, 2009.

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1 Good cause exists to support this stipulation and the request that this Court grant
2 the accompanying proposed order. Due to the holiday season, Farr has not had
3 sufficient time to prepare a response, and therefore requires an additional ten days to do
4 so. There have not been any prior requests to extend the time to respond to the Second
5 Amended Complaint. Moreover, the parties do not know of any other deadlines or
6 events set in this case, and therefore conclude that the requested ten day extension will
7 not have any other effect on the schedule of this case.

8 This stipulation and proposed order, if it is granted, avoids the necessity for Farr
9 to file, and for this Court to adjudicate, an administrative motion under Local Rule 7-11
10 in this regard. Therefore, the parties respectfully request that the Court grant their
11 proposed order.

12
13 IT IS SO STIPULATED:

14 Dated: December 26, 2008

LAW OFFICES OF DEK KETCHUM

15
16 By: 

JAY M. GOLDMAN

Attorneys for Defendant Farr Financial, Inc.

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18
19 Dated: December , 2008

M. VAN SMITH, ESQ.

20 By: _____

M. VAN SMITH

21 Attorney for Plaintiff Howard B. Higgins
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1 Good cause exists to support this stipulation and the request that this Court grant
2 the accompanying proposed order. Due to the holiday season, Farr has not had
3 sufficient time to prepare a response, and therefore requires one additional week to do
4 so. There have not been any prior requests to extend the time to respond to the Second
5 Amended Complaint. Moreover, the parties do not know of any other deadlines or
6 events set in this case, and therefore conclude that the requested one week extension
7 will not have any other effect on the schedule of this case.

8 This stipulation and proposed order, if it is granted, avoids the necessity for Farr
9 to file, and for this Court to adjudicate, an administrative motion under Local Rule 7-11
10 in this regard. Therefore, the parties respectfully request that the Court grant their
11 proposed order.

12
13 IT IS SO STIPULATED:

14 Dated: December 26, 2008

LAW OFFICES OF DEK KETCHUM

15
16 By: _____

JAY M. GOLDMAN

Attorneys for Defendant Farr Financial, Inc.

17
18 Dated: December 30, 2008

M. VAN SMITH, ESQ.

19
20 By: M. Van Smith

M. VAN SMITH


Attorney for Plaintiff Howard B. Higgins

ORDER

Good cause appearing, **IT IS SO ORDERED** that the stipulation and proposed order is **GRANTED**. Farr shall have through January 9, 2009, to file a response to the Second Amended Complaint in this mater.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 5, 2009



HON. JEFFREY S. WHITE
United States District Judge